

**REMARKS**

In the Office Action, claims 1-22 were rejected. Reconsideration and allowance of all pending claims are requested.

**Request for Expedited and Efficient Prosecution**

Applicants note that this is the fourth non-final Office Action for the referenced application. Applicants respectfully submit that, here again, the reference combination proposed by the Examiner does not present a *prima facie* case of obviousness.

**Request for Supervisory Review**

As noted above, Applicants wish to bring to the attention of the Examiner that this is the fourth non-final Office Action for the referenced application. In the interest of efficient prosecution, Applicants hereby request Supervisory review of the prosecution such that an allowance can be reached as soon as feasible. In particular, while the Examiner formulated a rejection adding a new reference, but maintaining much the same position with respect to two primary references. Applicants have already responded as to the Examiner's position on those two references, but the Examiner has still not responded to Applicants' arguments.

**Rejections Under 35 U.S.C. § 103**

Claims 1-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication 2004/0215664 A1 (hereinafter "Hennings") in view of U.S. Patent Publication 2002/0032677 A1 (hereinafter "Morgenthaler") and further in view of U.S. Patent 6,195,681 (hereinafter "Appleman").

Claims 1, 8, 15 and 22 are independent. All of the recited claims are believed to be patentable as cited below.

**Claim 1 and the Claims Depending Therefrom**

**Hennings and Morgenthaler fail to teach a method for adding an HTML document to a web site, the HTML document relating to a respective one of a plurality of categories of information.**

Applicants respectfully note that once again the Examiner has continued to maintain the position that Hennings and Morgenthaler teach the steps of adding an HTML keyword to the HTML document wherein the HTML keyword represents the respective one of the plurality of categories of information; activating a search in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword; calling a search engine to execute the activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword; and creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

In particular, the Examiner argued that Hennings is believed to teach adding an HTML keyword to the HTML document wherein the HTML keyword represents the respective one of the plurality of categories of information. The Examiner once again cited the passages at paragraphs [0090]-[0091] and FIGs. 7-9 of Hennings in support of the rejection.

A relevant portion of the cited passage at paragraph [0090] reads:

Another feature of the present invention is the ability to associate category information with design components in web page documents. This feature enables a web page author to insert a category list component in a design page. The category list component is used to automatically generate hyperlinks to various documents based on categorical information pertaining to the hyperlinks.

Applicants respectfully submit that the cited passages from Hennings do not support the Examiner's position. As previously noted, Applicants submit that Hennings teaches a method for generating hyperlinks in a referring document to documents that are stored on a server, each of the documents having a server address. In particular, as can be seen from FIG. 9A, a user can create web pages in a WYSIWYG environment by inserting various components such as graphics text. In addition, the user can also insert category list components *directly* in the design page. Furthermore, the category list components are used to automatically generate a list of one or more hyperlinks to documents on a web that are assigned a category matching the category associated with each category list component.

Applicants submit that the present application teaches and claims creating a HTML document representative of at least one category group or sub-group, where the HTML group can be searched using a search engine. In addition, one or more keywords representative of the category may be placed in the HTML header of the newly created HTML document. On the contrary, as can be seen from the cited passages and as summarized hereinabove, Hennings teaches adding a category list component *directly* in the design page. After careful review, Applicants reiterate that Hennings does not teach adding a *HTML keyword* to the *HTML document* where the HTML keyword represents the respective one of the plurality of categories of information.

Once again, the Examiner argued that Hennings is believed to teach creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword. The Examiner cited the passages at paragraphs [0007] and [0033] in support of the rejection.

A relevant portion of the cited passage at paragraph [0007] reads:

HTML documents are generally static, that is, their contents do not change over time unless modified by a service developer or by the author.

As previously noted, Applicants respectfully submit that the cited passage from Hennings does not support the Examiner's position. On the contrary, Applicants reiterate that the cited passage teaches that a user may modify the generally static HTML documents.

After careful review of Hennings, Applicants respectfully submit that the passage cited at paragraph [0033] from Hennings teaches the functioning of the Web server and Web browser communication using the Hypertext Transfer Protocol (HTTP) and hence does not support the Examiner's position.

Here again, as previously noted, Applicants submit that as can be seen from the cited passages and as summarized hereinabove, Hennings describes communication between the Web server and the Web browser employing the HTTP protocol. On the contrary, the present application teaches the dynamic creation of a HTML document by the search engine that is returned to the user. In particular, the search engine searches the directory that relates to the category of information to identify HTML documents that relate to the requested category of information. As the search engine identifies the HTML documents, the search engine dynamically creates a HTML document that includes a link to each of the identified HTML documents and this document is returned to the user. After careful review, Applicants reiterate that Hennings does not teach creating an up-to-date web page for the respective one of the plurality of categories of information from the search result, where the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

Applicants also note that the Examiner has once again argued that Hennings does not explicitly teach activating a search in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword, and calling a search engine to execute the activated search and produce a search result wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword.

Furthermore, the Examiner continued to maintain that Morgenthaler teaches a tree directory where each category is a directory or subdirectory containing the web site or web page and pertinent information. The Examiner cited the passages at paragraphs [0009], [0101], [0162] and FIGs. 6 and 20 in support of the rejection. Additionally, the Examiner argued that Morgenthaler teaches search engines that retrieve web sites and web pages matching the text or topic query or keyword and displays the results to the Internet user. The Examiner cited the passages at paragraphs [0010] and [0011] of Morgenthaler in support of the rejection.

Applicants have closely considered these passages and, indeed, the Morgenthaler patent as a whole. The cited passages from Morgenthaler, and the entire reference, do not support the Examiner's position, however. Applicants respectfully submit that Morgenthaler teaches a streamlined method of searching and pinpointing information available on the Internet. Further, in Morgenthaler, static screen shot images of the web site home pages are captured, converted into compressible files and into different sizes, constructed and categorized into a relational database, and then displayed into various sizes within a slideshow format or business directory format. Hence, Applicants reiterate that Morgenthaler teaches a searchable graphical database of static homepages and displaying the search resulting in an easily navigable graphical format.

On the contrary, Applicants submit that the present application teaches calling a search engine when a category is selected *without* the use of a *database*. The search

engine then searches the directory that relates to the category of information selected. In particular, the search engine searches the directory for HTML documents containing the HTML keyword of the category selected. After careful review, Applicants reiterate that Morgenthaler does not teach activating a search in the directory and calling a search engine to execute the activated search. Additionally, Applicants wish to reiterate that Morgenthaler does not teach calling a search engine to execute the activated search *without using a database.*

For at least the reasons summarized hereinabove and as previously argued, Applicants once again reiterate that Hennings and Morgenthaler fails to teach the subject matter as claimed in independent claim 1.

**Appleman fails to teach uploading the HTML document to a web site, the HTML document relating to a respective one of a plurality of categories of information.**

The Examiner acknowledged that Hennings and Morgenthaler fail to teach uploading the HTML document to a directory on the web site. However, the Examiner argued that Appleman teaches uploading the HTML document to a directory on the web site. The Examiner cited passages at col. 7, lines 42-67, col. lines 1-8, and fig. 9 in support of the rejection.

A relevant portion of the cited passage, at col. 7, lines 43-51 reads:

The network production process is shown in FIG. 9. A guide who is trained to use the template system (discussed further below) creates HTML documents (804) for her topic area on her personal computer (802). The guide may *upload the template based HTML documents to a directory called "/mcupload" (824) on a server computer (806).* The uploading of files may be accomplished with the file transfer protocol (FTP) or other conventional methods for transferring data files. [Emphasis added.]

Applicants respectfully submit that the cited passage from Appleman does not support the Examiner's position, however. As can be seen from the passage cited hereinabove, Applicants submit that the cited passage teaches that a user may create template based HTML documents and upload these template based HTML documents to the "/mcupload" directory on a server computer.

On the contrary, the present application teaches uploading the newly created HTML document to a directory in the web site, where *the directory is associated with the category of information selected*. Uploading the HTML document to the associated directory on the web site greatly facilitates the search engine to identify the new HTML document.

As can be seen from the cited passages and as summarized hereinabove, Appleman teaches a method for uploading template based HTML documents to a common directory, the "/mcupload" directory. After careful review of Appleman, Applicants reiterate that Appleman does not teach uploading a HTML document to a directory on the web site, where the directory is associated with the category of information selected.

For at least the reasons summarized hereinabove, Applicants respectfully submit that the combination of Hennings, Morgenthaler and Appleman fail to establish a *prima facie* case of obviousness. Accordingly, Applicants respectfully submit that independent claim 1 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

**Claim 8 and the Claims Depending Therefrom.**

Here again, the Examiner relied upon Hennings for teaching adding an HTML keyword to the HTML document wherein the HTML keyword represents the respective one of the plurality of categories of information. Additionally, the Examiner relied upon

Hennings for teaching creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

In addition, the Examiner acknowledged that Hennings does not explicitly teach activating a search for the HTML keyword of the at least one searchable HTML documents in the respective one of the plurality of directories when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword; and calling a search engine to execute the activated search and produce a search result containing a respective link to each of the at least one searchable HTML documents in the respective one of the plurality of directories containing the HTML keyword.

Furthermore, the Examiner relied upon Morgenthaler for teaching a tree directory where each category is a directory or subdirectory containing the web site or web page and pertinent information, and search engines that retrieve the web sites and web pages matching the text or topic query or keyword and displays the results to the Internet user.

Additionally, the Examiner acknowledged that Hennings and Morgenthaler fail to teach uploading the HTML document to a directory on the web site. Also, the Examiner relied upon Appleman for teaching uploading the HTML document to a directory on the web site.

As discussed for claim 1, the Examiner relied upon Hennings, Morgenthaler and Appleman for teaching a method for adding an HTML document to a web site, the HTML document relating to at least one of a plurality of categories of information. However, in view of the arguments discussed above for independent claim 1, Applicants submit that for the same reasons independent claim 8 and claims depending therefrom are clearly patentable over the cited references.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent claim 8 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

**Claim 15 and the Claims Depending Therefrom.**

Here again, the Examiner relied upon Hennings for teaching determining a plurality of searches wherein each respective one of the plurality of searches corresponding to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine. Further, the Examiner cited passages at paragraphs [0093]-[0094] and [0096] in support of the rejection.

As previously noted, Applicants respectfully submit that the cited passages from Hennings do not support the Examiner's position. Applicants reiterate that the cited passages from Hennings describe associating a category with each of the newly created web pages, where the category corresponds to category list components in the design page. Further, the user can also modify the category associated with an existing web page. The category information is stored as a meta-data entry in the contextual information file associated with the new or existing page, and the data promotion engine then parses through all of the documents on the site in search of documents that contain a category list component matching the category of the new document.

In contrast, the present application teaches deciding on a plurality of categories of information to be displayed on a website and determining a plurality of searches, where each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine. After carefully reviewing Hennings, Applicants reiterate that Hennings does not teach deciding on a plurality of categories of information to be displayed on a

web site. Further, Applicants reiterate that the cited passages do not teach determining a plurality of searches where each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine.

Additionally, the Examiner relied upon Hennings for teaching assigning a keyword for each respective one of the plurality of categories of information. The Examiner cited the passage at paragraph [0092] and FIGs. 7-9 in support of the rejection.

A relevant portion of the cited passage at paragraph [0092] reads:

The category list components are used to automatically generate a list of one or more hyperlinks to documents on a web that are assigned a category matching the category associated with each category list component.

Here again, Applicants respectfully reiterate that the cited passages from Hennings do not support the Examiner's position. Applicants submit that the cited passage teaches that one or more *categories* are assigned to each web page on the web site. On the contrary, Applicants submit that the present application teaches assigning one or more *keywords* to each of the categories, where the one or more keywords are stored in a HTML document. After careful review of Hennings, Applicants reiterate that Hennings does not teach assigning a *keyword* for each respective one of the plurality of *categories* of information.

Once again, the Examiner relied upon Hennings to teach creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword wherein the at least one assigned keyword is included in a HTML header of the at least one HTML document. The Examiner cited passages at paragraphs [0029]-[0030], [0090-0091] and FIGs. 7-9 in support of the rejection.

A relevant portion of the cited passage at paragraph [0030] reads:

For example, a gateway might receive queries, look up the answer in a database to provide a response, and translate the response into a page of HTML so that the server can send the response to the client.

Applicants wish to reiterate that the cited passages from Hennings do not support the Examiner's position. In particular, Applicants respectfully submit that the passages cited at paragraphs [0029]-[0030] teach the fundamentals of a web site, web server and a gateway. Further, the passages cited at paragraphs [0090]-[0091] teach inserting category information directly into a design page.

In contrast, as previously described with reference to independent claim 1, the present application teaches creating a new HTML document associated with each of the plurality of previously determined categories of information, where the HTML documents are stored in respective directories associated with each of the plurality of categories of information. Additionally, one or more keywords associated with each respective category of information are stored in the HTML header of the respective HTML document. A search engine using at least one of the plurality of searches and at least one assigned keyword may then search the HTML document. After careful review, Applicants reiterate that Hennings does not teach creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword.

As previously noted, the Examiner relied upon Hennings to teach creating a hypertext reference for providing the search engine with the at least one of the plurality of searches, the hypertext reference including an assigned keyword, wherein the hypertext reference directs the search engine to search a respective directory. The Examiner cited passages at paragraphs [0033], [0036] and FIGs. 7-9 in support of the rejection.

The cited passages from Hennings do not support the Examiner's position, however. In particular, Applicants respectfully reiterate that the passage cited at paragraph [0033] teaches communication between the web server and the web browser employing the HTTP protocol. Further, the passages cited at paragraph [0036] describes features generally associated with hyperlinks.

On the contrary, in the present application, a hypertext reference calling the search engine is specifically created. The hypertext reference includes the keyword or keywords to be searched. In addition, the hypertext reference also includes the directory or directories that contain the category, group or sub-group of information. However, after carefully reviewing Hennings, Applicants respectfully submit that Hennings does not teach creating a hypertext reference where the hypertext reference includes at least one assigned keyword.

In addition, the Examiner acknowledged that Hennings does not explicitly teach deciding on a plurality of categories of information to be displayed on a web site, and setting up a plurality of directories wherein each respective one of plurality of directories corresponding to a respective one of a plurality of categories of information, each of the plurality of directories containing at least one searchable HTML document.

Here again, the Examiner argued that Morgenthaler teaches a tree directory where each category is a directory or subdirectory containing the web site or web page and pertinent information. The Examiner cited the passages at paragraphs [0009], [0101], [0162] and FIGs. 6 and 20 in support of the rejection. Additionally, the Examiner argued that Morgenthaler teaches search engines that retrieve web sites and web pages matching the text or topic query or keyword, and displays the results to the Internet user. The Examiner cited the passages at paragraphs [0010] and [0011] in support of the rejection.

As previously noted with reference to independent claim 1, Applicants once again reiterate that Morgenthaler teaches a streamlined method of searching and pinpointing information available on the Internet. Further, in Morgenthaler, static screen shot images of the web site home pages are captured, converted into compressible files and into different sizes, constructed and categorized into a relational database, and then displayed into various sizes. Hence, Applicants submit that Morgenthaler teaches a searchable graphical database of static homepages and displaying the search resulting in an easily navigable graphical format.

On the contrary, Applicants submit that the present application teaches determining the categories of information to be displayed to the web site reader. In addition, the major groups and sub-groups of categories representative of subsets of information to be displayed to the web site reader are also determined. Further, the present application also teaches setting up a plurality of the directories, where each of the plurality of directories is associated with a respective category group and sub-group, and where each of the plurality of directories includes at least one searchable HTML document. After carefully reviewing Hennings, Applicants respectfully submit that Hennings does not teach deciding on a plurality of categories of information to be displayed on a web site, and setting up a plurality of directories wherein each respective one of plurality of directories corresponding to a respective one of the plurality of categories of information, each of the plurality of directories containing at least one searchable HTML document.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent claim 15 and claims depending therefrom are clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

**Claim 22**

Once again, the Examiner relied upon Hennings for teaching determining searches corresponding to the category of information, the search being executed by a search engine. Furthermore, the Examiner argued that Hennings teaches assigning a keyword for the category of information. Additionally, the Examiner relied upon Hennings for teaching creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword wherein the at least one assigned keyword is included in a HTML header of the at least one HTML document. The Examiner also argued that Hennings teaches creating a hypertext reference for providing the search engine with the at least one of the plurality of searches, the hypertext reference including an assigned keyword wherein the hypertext reference directs the search engine to search a respective directory.

Also, the Examiner further acknowledged that Hennings does not explicitly teach deciding on a category of information to be displayed on a web site, and set up a category that corresponds to the category of information, the directory containing at least one searchable HTML document.

In addition, the Examiner argued that Morgenthaler teaches a tree directory where each category is a directory or subdirectory containing the web site or web page and pertinent information. The Examiner cited the passages at paragraphs [0009], [0101], [0162] and FIGs. 6 and 20 in support of the rejection. Additionally, the Examiner argued that Morgenthaler teaches search engines that retrieve web sites and web pages matching the text or topic query or keyword, and displays the results to the Internet user. The Examiner cited the passages at paragraphs [0010] and [0011] in support of the rejection.

As discussed for claim 15, the Examiner relied upon Hennings and Morgenthaler for teaching a method for maintaining a web site via searching. However, Applicants respectfully submit that Hennings and Morgenthaler do not teach nor does the Examiner

argue that Hennings and Morgenthaler specifically teach deciding on a category of information to be displayed on a website, determining a search corresponding to the category of information, the search being executed by a search engine, assigning a keyword for the category of information and setting up a category that corresponds to the category of information, the directory containing at least one searchable HTML document. Absent such teachings, Hennings and Morgenthaler cannot teach a case of obviousness.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully submit that independent claim 22 is clearly patentable over the cited references and respectfully request the Examiner to reconsider rejection of the claims.

**Conclusion**

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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